

Objection: Claimant – Adam Jarlath Jordan - Claim Number - 46592

- RECEIVED
2024 NOV -8 AM 11:09
CLERK
US BANKRUPTCY COURT
DISTRICT OF DELAWARE
- a. Objection to be filed with the Office of the Clerk of the United States Bankruptcy Court for the District of Delaware: 824 Market Street, 3rd Floor, Wilmington, Delaware 19801, and served upon counsel to the Debtors, (a) Sullivan & Cromwell LLP, 125 Broad Street, New York, New York 10004, Attn: Christian P. Jensen (jensenc@sullcrom.com) and David M. Rosenthal (rosenthald@sullcrom.com) and (b) Landis Rath & Cobb LLP, 919 Market Street, Suite 1800, Wilmington, Delaware 19801, Attn: Adam G. Landis (landis@lrclaw.com) and Kimberly A. Brown (brown@lrclaw.com), Case No. 22-11068. Response to Objection - *DEBTORS' ONE HUNDRED SIXTH (SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN OVERSTATED AND/OR UNLIQUIDATED PROOFS OF CLAIM (CUSTOMER CLAIMS)*.
- b. Claimant – Adam Jarlath Jordan
Claim Number - 46592
Amount of claim - €4,996.00 in EUR currency, not sent by FTX Trading LTD as claimed, and later not appropriately investigated by the debtors mentioned herein.
- c. On November 6th 2022, I became aware of rumours that the cryptocurrency exchange FTX was insolvent and under threat of bankruptcy. I held some funds in the region of \$5,040.19 and began efforts to withdraw my funds from the exchange by a variety of unsuccessful means.

My first attempt was to submit a withdrawal request for the aforementioned figure through a wire transfer (see item 1 below).

On November 7th this attempt was met with some difficulty (see item 2) due to my geographic location (EU) and Euro based bank accounts. Understanding the time sensitive nature of the situation, I cancelled this request (see item 3).

On November 8th I partially converted the funds to the cryptocurrency 'XRP' and attempted a partial withdrawal, which I cancelled shortly thereafter as I believed it was unlikely to proceed due to the massive volumes of 'crypto' requests being submitted to the exchange.

I subsequently converted all of the available funds to Euros, excluding some residual cryptocurrency amounts and 89 cents (USD) and submitted a withdrawal request (8 November 2022 at 16:28 – item 4) to my personal bank account in Ireland (AIB – current account, IBAN ending 79096).

The very same minute I submitted the request, I received an email (item 5 - 8 November 2022 at 16:28) confirming that the request had been processed and that the funds would be in my account in 'three to five business days'. I found this to be highly unusual and extremely unlikely, given the severity of the problems unfolding at the exchange on a public level.

As per my original claim filed, I never received the funds into my bank account, as evidenced in the supporting documentation (bank statement encompassing those dates). I have attached additional pages to outline the funds were never received (Item 6) and further investigated the matter with my bank, who confirmed a transfer was never received.

The legal basis for my response to the above complaint is the debtors did not adequately investigate the veracity of my claim through communication with myself, or by referencing the transfer logs to ensure they were correct and matching my details.

A notable case that addresses the duty of debtors to adequately investigate claims before seeking dismissal is *In re Intellogic Trace, Inc.*, 200 F.3d 382 (5th Cir. 2000). In this case, the Fifth Circuit held that debtors, or those acting on behalf of the bankruptcy estate, have an obligation to thoroughly examine the merits of claims before deciding to dismiss or settle them. Specifically, the court emphasized that fiduciaries, such as trustees or debtor-in-possession managers, should not dismiss claims without adequate investigation, as they have a duty to maximize the estate's value for the benefit of creditors.

In *Intellogic Trace*, the debtor company filed for Chapter 11 bankruptcy, and the trustee considered dismissing certain claims that could potentially benefit the estate. The court found that without sufficient inquiry, dismissing these claims could result in a loss of potential assets that could be used to satisfy creditor obligations. Therefore, this case reinforces that debtors must thoroughly investigate claims, as prematurely dismissing viable claims without due diligence could constitute a breach of fiduciary duty to creditors.

This precedent emphasizes the legal responsibility of debtors and trustees to ensure they do not dismiss potentially valuable claims without a reasonable basis grounded in adequate investigation.

- d. Please see the prior referenced supporting documents attached to this document.
- e. Name – Adam Jarlath Jordan
Address – 6 Maolchnoc, Ballymoneen Road, Galway, Ireland – H91 RY6D

Mobile - +353876183284

I, Adam Jordan, may be contacted directly on this matter as I do not have counsel in the United States.



Personal Bank Account

Statement of Account with Allied Irish Banks, p.l.c.

Branch
Upper Salthill, Galway

National Sort Code
93-74-01

Account Name
MR ADAM JORDAN

Item 6

74240C101

MR ADAM JORDAN
FURBOGARVE
FURBO
GO GALWAY

Telephone
091-521544

Account Number
[REDACTED] 9-096

Page Number
229

Date of Statement
Forward

This is an eligible deposit under the Deposit Guarantee Scheme. For more information, please see the 'Deposit Guarantee Scheme - Depositor Information Sheet' which is available from your branch or on our website - www.aib.ie

IBAN: IE68 AIBK [REDACTED] 790 96 (BIC: AIBKIE2D)

Date	Details	Debit €	Credit €	Balance €
28 Oct 2022	BALANCE FORWARD			[REDACTED]
	Interest Rate			
	Lending @ 11.850%			
	Expenses		624.00	
	Salary		3176.34	
	D/D ST ANTHONY'S C	367.02		
	IE22102505692754			
	VDC-PADRAICINS	5.30		[REDACTED]
1 Nov 2022	VDP-GALWAY SENIOR	40.00		
	VDC-CLYBAUN TAVERN	30.75		
	VDC-CULLINANES SAL	6.20		
	VDC-CULLINANES SAL	17.20		
	VDC-SLEMONS DAYBRE	10.98		
	VDC-TAYLORS BAR	30.50		
	VDC-TESCO STORES 4	14.50		[REDACTED]
2 Nov 2022	ADAM JORDAN		115.00	
	IE22110215502835			[REDACTED]
3 Nov 2022	*MOBI RENT	430.00		[REDACTED]
7 Nov 2022	VDP-Revolut**5169*	28.00		
	VDP-SP KWACK GOLF	91.80		
	VDC-CLARKES BARN	15.00		
	VDC-SLEMONS DAYBRE	7.10		
	VDC-SLEMONS DAYBRE	8.65		[REDACTED]
9 Nov 2022	VDP-SILVER STRAND	49.62		
11 Nov 2022	VDC-CUTTHROAT BARB	30.00		
	VDC-JOHN DAVID SPO	40.00		
	VDC-UTS TECHNOLOGI	2.20		[REDACTED]
14 Nov 2022	VDP-Revolut**5169*	30.00		
	VDC-CIRCLE K NEWCA	5.60		
	VDC-CLYBAUN TAVERN	6.10		
	VDC-HUGHES BAR	19.60		[REDACTED]

For Important Information and Standard Conditions regarding your account log onto www.aib.ie/standardconditions

Overdrawn balances are marked dr

Allied Irish Banks, p.l.c. is regulated by the Central Bank of Ireland.

Thank you for banking with us.



Personal Bank Account

Statement of Account with Allied Irish Banks, p.l.c.

Branch
Upper Salthill, Galway

National Sort Code
93-74-01

Account Name
MR ADAM JORDAN

Item 6

74240D101

MR ADAM JORDAN
FURBOGARVE
FURBO
GO GALWAY

Telephone
091-521544

Account Number
579-096

Page Number
230

Date of Statement
Forward

This is an eligible deposit under the Deposit Guarantee Scheme. For more information, please see the 'Deposit Guarantee Scheme - Depositor Information Sheet' which is available from your branch or on our website - www.aib.ie

IBAN: IE68 AIBK 790 96 (BIC: AIBKIE2D)

Date	Details	Debit €	Credit €	Balance €
14 Nov 2022	BALANCE FORWARD			
	Interest Rate			
	Lending @ 11.850%			
	VDC-HUGHES BAR	19.60		
	VDC-LONERGANS BAR	6.00		
	VDC-LONERGANS BAR	6.00		
	VDC-O CONNORS CENT	37.85		
15 Nov 2022	VDA-BOI 43 EYRE SQ	250.00		
	GALWAY 9			
	11NOV22 22:37			
18 Nov 2022	VDC-DELANEYS MACE	3.20		
	VDC-DOLAN PIER LTD	9.00		
21 Nov 2022	ATM LYNCHS CASTLE1	250.00		
	18NOV22 TIME 21:37			
	VDP-BROWN THOMAS	140.00		
	VDP-CIRCLE K M6 AT	4.00		
	VDP-LACOSTE	77.00		
	VDP-Revolut**5169*	15.00		
	VDP-TED BAKER	106.00		
	VDC-ALL SAINTS RET	38.40		
	VDC-DAYBREAK EYRE	1.00		
	VDC-GARAVAN S BAR	14.70		
	VDC-SILVER STRAND	1.10		
	VDC-SUPERMACS	10.50		
	VDC-SUPERMACS	14.95		
	VDC-THE ZIP YARD	30.00		
23 Nov 2022	VDC-SLEMONS DAYBRE	3.09		
	VDC-SLEMONS DAYBRE	8.60		
24 Nov 2022	*MOBI CAR	344.40		
	VDC-SILVER STRAND	40.83		
25 Nov 2022	VDP-Nike IE	137.96		

For Important Information and Standard Conditions regarding your account log onto www.aib.ie/standardconditions

Overdrawn balances are marked dr

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Thank you for banking with us.



Personal Bank Account

Statement of Account with Allied Irish Banks, p.l.c.

Branch
Upper Salthill, Galway

National Sort Code
93-74-01

Account Name
MR ADAM JORDAN

Item 6

74240E101

MR ADAM JORDAN
FURBOGARVE
FURBO
GO GALWAY

Telephone
091-521544

Account Number
679-096

Page Number
231

Date of Statement
Forward

This is an eligible deposit under the Deposit Guarantee Scheme. For more information, please see the 'Deposit Guarantee Scheme - Depositor Information Sheet' which is available from your branch or on our website - www.aib.ie

IBAN: IE68 AIBK 6790 96 (BIC: AIBKIE2D)

Date	Details	Debit €	Credit €	Balance €
25 Nov 2022	BALANCE FORWARD			
	Interest Rate			
	Lending @ 11.850%			
	VDC-NDLS GALWAY	35.00		
28 Nov 2022	VDP-FREENEY'S	29.50		
	VDP-UBER PASS	10.10		
	9.99 USD@			
	1.035233			
	INCL FX FEE E0.45			
	D/D ST ANTHONY'S C	367.02		
	IE22112435777462			
	VDC-CLARKES BARN	24.69		
	VDC-Massimo	16.00		
	VDC-O CONNORS CENT	2.40		
	VDC-O CONNORS CENT	8.95		
	VDC-SLEMONS DAYBRE	1.35		
	VDC-SLEMONS DAYBRE	2.60		
	VDC-SUPERMACS	17.45		
	VDC-THE DAIL BAR	12.60		
	VDC-THE KINGS HEAD	18.40		
	VDC-7 BRIDGE STREE	15.60		
29 Nov 2022	Expenses		586.00	
	Salary		3176.34	
30 Nov 2022	*MOBI RENT BILLS	425.00		
	*MOBI SKI ACCOM	536.00		
	VDC-HAVEN PHARMACY	16.30		
	VDC-SLEMONS DAYBRE	5.00		
1 Dec 2022	VDC-SLEMONS DAYBRE	7.05		
2 Dec 2022	VDP-RYANAIR DG	426.46		
5 Dec 2022	VDP-APPLE.COM/BILL	27.49		
	VDP-CUTTHROAT BARB	30.00		

For Important Information and Standard Conditions regarding your account log onto www.aib.ie/standardconditions

Overdrawn balances are marked dr

Allied Irish Banks, p.l.c. is regulated by the Central Bank of Ireland.

Thank you for banking with us.

11/7/24, 11:38 AM

Trinity College Dublin Mail - FTX withdrawal request



Adam Jordan <adjordan@tcd.ie>

FTX withdrawal request

FTX Cryptocurrency Derivatives Exchange <support@ftx.com>
To: adjordan@tcd.ie

8 November 2022 at 16:28

Hello Adam Jordan,

We have received a request to withdraw 4996.00 EUR from your FTX account.

If you did not make this request, please change your password and contact customer support immediately.

Withdrawals are processed within one business day. FTX is not responsible for delays or fees resulting from your bank or intermediary banks it uses. You can find more information at <https://help.ftx.com/hc/en-us/articles/360043023772-Depositing-Withdrawing-Fiat->.

Item 4



ENDA CONWAY
Executive Director
Head of Integrated Marketing

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WPP FORD
175 Greenwich St. Floor 32
New York, NY
10007

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11/7/24, 11:26 AM

Trinity College Dublin Mail - FTX withdrawal request



Adam Jordan <adjordan@tcd.ie>

FTX withdrawal request

FTX Cryptocurrency Derivatives Exchange <support@ftx.com>
To: adjordan@tcd.ie

6 November 2022 at 18:45

Hello Adam Jordan,

We have received a request to withdraw 5040.19 USD from your FTX account.

If you did not make this request, please change your password and contact customer support immediately.

Withdrawals are processed within one business day. FTX is not responsible for delays or fees resulting from your bank or intermediary banks it uses. You can find more information at <https://help.ftx.com/hc/en-us/articles/360043023772-Depositing-Withdrawing-Fiat->.

Item 1

11/7/24, 11:27 AM

Trinity College Dublin Mail - You have a new message from FTX relating to your support issue



Adam Jordan <adjordan@tcd.ie>

You have a new message from FTX relating to your support issue

FTX <no-reply@notifications.ftx.com>
Reply-To: support@ftx.com
To: adjordan@tcd.ie

7 November 2022 at 11:11

Item 2



Hello Adam Jordan,

An admin has opened a ticket for your account. You can view it using the support tool:
<https://ftx.com/support/1178951>.

Please read the ticket. You can respond from that page.



This is an automated message, please do not reply.
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11/7/24, 11:31 AM

Trinity College Dublin Mail - FTX fiat withdrawal cancelled



Adam Jordan <adjordan@tcd.ie>

FTX fiat withdrawal cancelled

FTX Cryptocurrency Derivatives Exchange <support@ftx.com>

7 November 2022 at 11:11

To: adjordan@tcd.ie

Hello Adam Jordan,

Your withdrawal of 5040.19 USD to the address

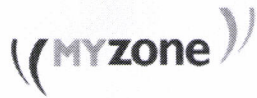
```
{"beneficiary-address":{"street-1":"Furbogarve","street-2":"Furbo","city":"Galway","country":"IRL","region":"Connacht","postal-code":"H91KWP3"},"bank-name":"Allied Irish Bank","bank-account-number":"IE68AIBK93740120679096","bank-account-address":"Upper Salthill, Galway, Ireland","swift-code":"AIBKIE2D","bank-account-name":"Adam Jordan","reference":"AJ FTX","funds-transfer-type":"wire-international"}
```

has been cancelled.

Item 3

11/7/24, 11:39 AM

Trinity College Dublin Mail - FTX fiat withdrawal sent



Adam Jordan <adjordan@tcd.ie>

FTX fiat withdrawal sent

FTX Cryptocurrency Derivatives Exchange <support@ftx.com>
To: adjordan@tcd.ie

8 November 2022 at 16:28

Hello Adam Jordan,

Your fiat withdrawal of 4996.00 EUR has been processed. Please allow three to five business days for the transfer to arrive in your bank account.

Item 5

View/Print Label

1. Ensure there are no other shipping or tracking labels attached to your package. Select the Print button on the print dialogue box that appears. Note: If your browser does not support this function, select Print from the File menu to print the label.
2. Place the label in a UPS Shipping Pouch. If you do not have a pouch, affix the folded label using clear plastic shipping tape over the entire label.
3. GETTING YOUR SHIPMENT TO UPS

Customers with a scheduled Pickup
 - Your driver will pickup your shipment(s) as usual.

Customers without a scheduled Pickup
 - Schedule a Pickup on ups.com to have a UPS driver pickup all of your packages.
 - Take your package to any location of The UPS Store®, UPS Access Point(TM) location, UPS Drop Box, UPS Customer Center, Staples® or Authorized Shipping Outlet near you. To find the location nearest you, please visit the Locations Quick link at ups.com.

UPS Access Point™
THE UPS STORE
82 NASSAU ST
NEW YORK NY 10038-3703

UPS Access Point™
THE UPS STORE
33 PARK PL
NEW YORK NY 10007-2485

UPS Access Point™
THE UPS STORE
27 TRINITY PL
NEW YORK NY 10006-2909

FOLD HERE

VML
6467121432
ENDA CONWAY
3 WORLD TRADE CENTER
NEW YORK NY 10007

SHIP TO:
OFFICE OF THE CLERK OF US BANKRUPTCY
OBJECTION - DEBTORS 100 6TH OMNIBUS
3RD FLOOR
824 N MARKET ST
WILMINGTON DE 19801

0.5 LBS LTR

1 OF 1

DE 197 9-25

UPS NEXT DAY AIR

1

TRACKING #: 1Z 9PK 09T 01 0001 4211

BILLING: P/P

Reference #1: Aj Docs

XOL 24.10.17 NV45-45.0A 11/2024*